



Teddington Direct River Abstraction

Preliminary Environmental Information Report
Appendix 16.1 – Human Health Policy, Plan and
Legislation Review

Volume: 3

Date: June 2025

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Appendix 16.1 – Human Health Policy, Plan and Legislation Review

A.1 Introduction

- A.1.1 This appendix supports Chapter 16: Human Health of the Preliminary Environmental Information (PEI) Report of the Teddington Direct River Abstraction (DRA) Project (the Project) on behalf of Thames Water.
- A.1.2 The appendix provides further details of planning policies and health policies judged relevant to the human health assessment for the Project. This includes informing the scope and approach to the assessment, as well as understanding health policy priorities which may be of relevance when considering the significance of health effects in relation to guidance.
- A.1.3 The appendix reports text deemed most relevant to the health assessment, and in some places paraphrases policy based on the assessor's interpretation.

A.2 Policy Review

National Planning Policy

- A.2.1 This section provides an overview of national planning policies which have been taken into consideration for this assessment.

National Policy Statement for Water Resources and Infrastructure

- A.2.2 The **National Policy Statement for Water Resources and Infrastructure**, 2023, (referred to as the **NPS**) sets out the Government's policies to deliver the development of significant infrastructure projects for water resources in England under the Planning Act 2008. Relevant points in relation to health from the **NPS** are:
- Paragraph 3.12.1 states, infrastructure can have both direct impacts on health and that the, 'construction and use of water resource infrastructure has the potential to affect people's health and well-being and quality of life.' Direct impacts on health can include; noise, traffic, vibration, polluting water discharges, dust, odour and community severance.
 - Paragraph 3.12.2 states that, 'new or enhanced water resources infrastructure,' could also have indirect health impacts. Examples of indirect impacts include affecting 'access to key public services, local transport opportunities for cycling and walking, or use of open space for recreation and physical activity'.
 - Further, paragraph 3.12.3 states, 'Where the proposed project has likely significant environmental impacts that would have an effect on human population or health, the applicant should identify and set out the assessment of any likely significant health impacts.'
 - In paragraph **3.12.4** it notes the importance of the cumulative impacts of health impacts and states that these should be considered, along with mitigation to, 'avoid, reduce or compensate for adverse health impacts and seek enhancement opportunities as appropriate,' as reflected in the EIA Regulations.¹

¹ Department for Environment Food and Rural Affairs. (2023) *National Policy Statement for Water Resources Infrastructure*. Available at: https://assets.publishing.service.gov.uk/media/6437e3a2f4d42000cd4a1a7/E02879931_National_Policy_Statement_for_Water_Resources.pdf (Accessed: December 2024).

National Planning Policy Framework 2024

- A.2.3 The National Planning Policy Framework (NPPF) details the Government's planning policies for England. **Chapter 8**, 'Promoting healthy and safe communities,' sets out the planning policy for promoting healthy and safe communities, stating that, '*planning ... decisions should aim to achieve healthy, inclusive and safe places*', through planning positively for shared spaces, that promote social interaction, are safe and accessible and enable and support healthy lives. It identifies that access to open space and recreation is important for the health and wellbeing of communities.
- A.2.4 **Paragraph 101**, also encourages speedier delivery of public services, with local planning authorities expected to proactively and collaboratively engage with promoters, delivery partners and statutory bodies especially when planning for required facilities, resolving key planning issues before planning applications are submitted. Significant consideration should be given to, '*new, expanded or upgraded public service infrastructure*.'²

National Health Policy and Priorities

- A.2.5 **The Health and Safety at Work etc Act, 1974**, and **The Construction (Design and Management) Regulations, 2015** provide frameworks through which work, and construction related safety risks are managed, including legal obligations on employers, employees, project managers, designers and contractors to ensure risks to health are avoided or controlled to be as low as reasonably practicable. On this basis, risks to health for construction and operational workers due to safety issues are not considered relevant to the scope of EIA, as they are managed through other legislative requirements.

NHS Long-Term Plan (v1.2) 2019

- A.2.6 The **NHS Long Term Plan**, sets out the 10-year vision for the National Health Service (NHS), focusing on patient outcomes and tackling health inequalities, recognising that good health is more than healthcare alone and it involves improving upstream prevention of avoidable illness and the worsening of existing illnesses. It states that, '*a comprehensive approach to preventing ill-health also depends on actions that only individuals, companies, communities and national government can take to tackle wider threats to health, ensuring health is hardwired into social and economic policy*.' The Plan aims to take a '*more concerted and systematic approach to reducing health inequalities....*' with this approach being reflected in their Public Sector Equality Duties, with targeted funding for areas with higher inequalities and setting measurable goals for reducing inequalities. The plan further states that action by the NHS cannot be a substitute for the important role of local government, but should be complementary. The Plan also notes the significance of air pollution and lack of exercise as important contributing risk factors to causes of premature death in England.³

² Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf> (Accessed: 7 January 2025).

³ NHS England (2022) *NHS Long Term Plan*. Available at: <https://www.england.nhs.uk/wp-content/uploads/2022/07/nhs-long-term-plan-version-1.2.pdf> (Accessed: July 2024).

- A.2.7 This is linked to the Health in All Policies (HiAP) approach which involves a systematic and collaborative approach to improve public health by incorporating health considerations into decision-making across sectors and policy areas.⁴

Health and Social Care Act 2012 and 2022

- A.2.8 The **2012, Health and Social Care Act**, set out the statutory duties of local authorities to improve population health and well-being especially at local level, driven by local authorities.⁵⁶
- A.2.9 Subsequently, the **Health and Care Act, 2022**, introduced Integrated Care Systems (ICSs) which aims to, 'join-up NHS services with local authorities and social care providers, fostering an integration to improve health outcomes and address health inequalities.'⁷

Fair Society, Healthy Lives, 2010

- A.2.10 **Fair Society, Healthy Lives, The Marmot Review**, presented a robust and well-evidenced business case for national and local action to address health inequalities. It looked at the differences in health and well-being between social groups and describes how underlying factors such as; income, employment, education attainment and the quality of a neighbourhood, can contribute to poor health outcomes and the inequalities of the social gradient. The social gradient describes the relationship between a person's social position and health, whereby, the lower a person's social position, the worse their health is. It these social inequalities that result in health inequalities.⁸

Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)

- A.2.11 This White Paper provides a response to the Marmot Review and recognises that health outcomes are influenced by social determinants. It advocated for an approach to public health that empowers local communities, promotes healthier lifestyles, and address the root causes of health inequalities.⁹

⁴ Local Government Association (2024) *Health in All Policies: A Manual for Local Government*. Available at: <https://www.local.gov.uk/publications/health-all-policies-manual-local-government> (Accessed: July 2024).

⁵ Health and Social Care Act 2012, c. 7. Available at: <https://www.legislation.gov.uk/ukpga/2012/7/contents> (Accessed: December 2024).

⁶ Department of Health and Social Care (2012) *Factsheet: New Focus for Public Health*. Available at: <https://assets.publishing.service.gov.uk/media/5a7b6e5b40f0b646469361cb/B4.-Factsheet-New-focus-for-public-health-250412.pdf> (Accessed: December 2024).

⁷ The King's Fund (2022) *Health and Care Act 2022: Making Sense of the Legislation*. Available at: <https://www.kingsfund.org.uk/insight-and-analysis/projects/health-and-care-act-2022-make-sense-legislation> (Accessed: December 2024).

⁸ Marmot, M., Goldblatt, P., Allen, J., et al. (2010) *Fair Society, Healthy Lives (The Marmot Review)*. Available at: <https://www.instituteofhealthequity.org/resources-reports/fair-society-healthy-lives-the-marmot-review/fair-society-healthy-lives-full-report-pdf.pdf> (Accessed: September 2024).

⁹ HM Government. *Healthy Lives, Healthy People: Our strategy for public health in England* (2010). Available at: https://assets.publishing.service.gov.uk/media/5a74fd1640f0b6360e472767/dh_127424.pdf (Accessed: December 2024).

Public Health England Strategy 2020 to 2025

- A.2.12 This strategy sets out **Public Health England*** (PHE) work to protect and improve the public's health and reduce health inequalities. It outlines collaboration with system partners such as local authorities, healthcare providers and other public health stakeholders to implement interventions to help people avoid poor health, reduce the growth in demand on public services and support economic growth.¹⁰
- A.2.13 ***Note** PHE was disbanded in 2021 with its functions transferred to the UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities (OHID).

UK Health Security Agency Strategic Plan 2023 – 2026

- A.2.14 The **UK Health Security Agency (UKHSA) Plan** sets out the governments vision to prepare, prevent and respond to health threats. The plan recognises that health threats may impact people in different ways, and often disproportionately impact certain groups. The human health chapter provides an assessment of effects on human beings, including the identification of potential adverse health outcomes and it identifies significant disproportionate effects between the general population and vulnerable groups.¹¹

London Planning Policy

London Health Inequalities Strategy 2018 – 2028

- A.2.15 The **London Health Inequalities Strategy** sets out the priorities to tackle health inequalities in London. The strategy focuses heavily on the wider determinants of health on the basis that these are the factors that lead to health inequalities. Regarding objectives for healthy communities set out in section four of the strategy, it recognises the importance of participation, empowerment and social networks in supporting health, wellbeing and social cohesion. This health assessment has considered potential impacts on social networks and participation, and how these may affect health outcomes.¹²

The London Plan 2021

- A.2.16 This plan has been developed in line with the Greater London Authority Act, 1999 (as amended) and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. This Spatial Development Strategy (SDS) has regard for equality of opportunity for all people, reducing health inequalities for all Londoners and achieving sustainable development in the United Kingdom.

¹⁰ Public Health England (2019) *PHE Strategy 2020-25*. Available at: https://assets.publishing.service.gov.uk/media/5d7b72c8ed915d5257b5b66c/PHE_Strategy_2020-25.pdf (Accessed: September 2024).

¹¹ UK Health Security Agency (2023) *UKHSA 3 Year Strategy*. Available at: https://assets.publishing.service.gov.uk/media/650d530e52e73c00139426c1/UKHSA_3_year_strategy.pdf (Accessed: December 2024).

¹² Greater London Authority. (2018). *The London Health Inequalities Strategy*. Available at: https://www.london.gov.uk/sites/default/files/health_strategy_2018_low_res_fa1.pdf [Accessed December. 2024]

- A.2.17 The London Plan is legally part of each of London's Local Planning Authorities Development Plan and as such, *'must be taken into account when planning decisions are made and all planning applications should be determined in accordance with it, unless there are sound planning reasons which indicate otherwise.'*
- A.2.18 Of relevance to this project, **Policy GG3, Creating a healthy city** - which focuses on improving health and reducing health inequalities for Londoners. In terms of planning and development, the policy sets out the following requirements, for those involved in planning and development:
- a. A - Ensure wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health.
 - b. B - Promote more active and healthy lives and
 - c. C - Assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.
- A.2.19 Also relevant is **Policy D8 Public Realm**, which states that new developments must be well designed, safe, accessible, inclusive, attractive and well-connected to make active travel the priority choice of transport. It outlines the impact of public realm on quality of life and health and social factors.¹³

Adopted Local Planning Policy

London Borough Hounslow (LBH) Local Plan 2015 - 2030

- A.2.20 Policies relevant to the Project include:
- A.2.21 **Policy CI3 - Health Facilities and Healthy Places** sets out the council's approach to improving accessible health care to promote well-being among the local communities. Development proposals are expected to contribute to the health and well-being of the local community. This should be achieved by using guidelines such as Active Design, and major developments are required to conduct Health Impact Assessments.
- A.2.22 Active Design guidelines have been developed collaboratively between Sport England, Active Travel (ATE) and the Office for Health Improvement and Disparities. These guidelines are founded on 10 principles around the built and natural environments to create active environments that, *'encourage people to be active through their everyday lives.'*¹⁴

¹³ Greater London Authority (2021) *The London Plan 2021*. Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf (Accessed: December 2024).

¹⁴ Sport England. (2023). *Active Design*. Retrieved January, 2025, from <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2023-05/Document%201%20-%20Active%20Design%20FINAL%20-%20May%202023.pdf?VersionId=8r2r2fz4cAR7cgXcuhgkDC6g4egV3bKH> (Accessed: January 2025).

- A.2.23 Where an HIA is required, the council expects that broader health and well-being impacts arising from a development are addressed to mitigate negative impacts and health risks arising from the scheme.
- A.2.24 **Policy CC2 – Urban Design and Architecture**, aims to, ‘retain, promote and support high quality urban design and architecture to create attractive, distinctive and liveable places.’
- A.2.25 **Paragraph 6.8**, states ‘Urban design and architecture are also important contributors to health outcomes, particularly through the encouragement of more active lifestyles,’ noting that ‘Active design’ can be garnered with the creation of accessible places, encouraging active lifestyles and ensuring new developments connect with existing parks and open spaces for recreation, and providing facilities that support exercises.
- A.2.26 **Policy GB2 – Open Space**. The policy recognises the importance of access to open space as an important contributor to the health and well-being of borough residents, providing space for sport, physical activity and play, as well as space for recreation and leisure activities.
- A.2.27 ‘Proximity to significant sources of noise or air pollution can have a negative impact on the usability of Local Open Space for off-site amenity provision.’
- A.2.28 **Policy GB9 – Play Space, Outdoor Sports Facilities and Burial Space**. The council opposes the loss of play areas or outdoor sports facilities, including playing fields and is committed to improving open spaces to meet demands for a range of sports and active pursuits across the borough.
- A.2.29 Development proposals should avoid the loss of play areas, burial spaces or outdoor sports facilities, including playing fields, except in very special circumstances, as outlined in the NPPF. Additionally, proposals are required to contribute to the improvements of outdoor facilities, expansion of play spaces or the development of new play spaces where appropriate, in accordance with the standards set out in the London Local Plan.

London Borough of Richmond (LBR) upon Thames Local Plan 2018-2033

- A.2.30 Policies relevant to this Project include:
- LP 12 – Green Infrastructure which states to protect the integrity of the spaces.
 - LP 18 – River corridors – development proposals along the Thames should have consideration of the local character, maintaining existing public access and ensuring riverside accessibility for pedestrians and cyclists.
 - LP 23 – Water Resources and Infrastructure – protect the borough’s water resources, ensuring developments do not jeopardise the borough’s water courses.
 - LP 28 – Social and Community Infrastructure to provide for the health and recreational needs of communities for quality of life.
 - LP 30 – Health and Wellbeing – important to ensure environments, ‘enhance people’s health and wellbeing.’

- A.2.31 Part B of LP 30 states, 'a Health Impact Assessment must be submitted with all major development proposals.'¹⁵

Kingston Core Strategy 2012-2027

- A.2.32 **Policy DM 21** discusses health impacts and requires that HIA are conducted for all major developments to ensure they contribute positively to public health outcomes. HIAs will be expected to identify both the positive and negative impacts on the health, safety and wellbeing of the local population. These assessments will inform decisions regarding the granting of planning permission and should incorporate both quantitative and qualitative data, including insights from population needs assessments, stakeholder input, and local knowledge. The policy recommends the Mayor's Best Practice Guidance on Health Issues in Planning.
- A.2.33 It is considered best practice to seek pre-application advice for significant developments, during which the requirement for an HIA can be determined as part of the initial screening process. The policy notes that for EIA projects, the HIA may be integrated into the EIA and when an HIA is mandated, the assessment should be carried out in collaboration with the health authority.¹⁶

Emerging Planning Policy

LBH Local Plan 2020 - 2041

- A.2.34 Due for adoption in 2025, the following considerations relevant to this Project include:
- A.2.35 Under Reinforcing Local Character and Context, paragraph 2.30 consider the quality of life and health of residents with infrastructure and good design that, '*respects and enhances local character.*'
- A.2.36 Objective 5e – Maximising the Benefits of Our Green and Blue Infrastructure whereby, A) green and blue spaces are protected and maintained to improve quality, openness and accessibility supporting health and well-being, B) enhance green and blue infrastructure with improved access for residents and C) encourage active lifestyles.
- A.2.37 Objective 6 – Delivering Community Infrastructure to encourage, 'active lifestyles and increase social interaction.'
- A.2.38 In Chapter Eight, Community Infrastructure, Policy, CI3, Health Facilities and Healthy Places, H I - HIAs will be required for major non-residential schemes.¹⁷

¹⁵ London Borough of Richmond upon Thames. (2018). Adopted Local Plan Interim. Retrieved January 2025, from https://www.richmond.gov.uk/media/15935/adopted_local_plan_interim.pdf

¹⁶ Royal Borough of Kingston upon Thames (2012) Core Strategy. Available at: <https://www.kingston.gov.uk/downloads/file/36/core-strategy> (Accessed: July 2024).

¹⁷ London Borough of Hounslow. (2024). *Hounslow Local Plan 2020-2041 Proposed Submission Version*. Retrieved January, 2025, from https://www.hounslow.gov.uk/info/20167/local_plan/1549/local_plan_review/2

LBR Draft (Regulation 19) Local Plan (2023)

- A.2.39 The draft LBR Local Plan sets out a number of strategic policies and guidance for development in the borough over the next 15 years from adoption, expected early 2025. Strategic policies relevant to this Project include:
- A.2.40 Policy 51 – Health and Wellbeing supports developments that will promote healthy lifestyles and that reduce health inequalities. Further, Section B of Policy 51, states, '*A HIA must be submitted with all major applications. A HIA should assess the health impacts of a development, identifying mitigation measures for any potential negative impacts as well as measures for enhancing any potential positive impacts.*'
- A.2.41 Point 25.14 determines HIAs to be submitted with major applications and recommends the early use of the London Healthy Urban Development Unit (HUDU) rapid HIA tool to evaluate the impacts of development proposals and recommend measures. This tool should be established at the pre-application stage. The human health assessment has proposed to undertake a comprehensive HIA which will be integrated to the EIA process. The HUDU tool was used to supplement the list of health determinants considered at the scoping stage.
- A.2.42 Policy 37 - Public Open Space, Play, Sport and Recreation promotes a healthy lifestyle through ensuring access to open spaces and recreation opportunities to support the health and wellbeing of residents and encourages physical activity through protecting and, where possible enhancing public open space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields.
- A.2.43 Policy 40 – Rivers and River Corridors states that all development proposals alongside or adjacent to the borough's river corridors should '*retain existing public access to the riverside and alongside the river (...) enhance public access (...) or provide new public access to the riverside where possible.*' In terms of the River Thames public riverside walk, it is required that proposals provide continuous accessible riverside walk for pedestrians and cyclists.
- A.2.44 Policy 9 – Water Resources and Infrastructure states that water resources and supplied will be protected from developments that will, '*pose a threat to the borough's rives, surface water and groundwater quality and quantity.*'¹⁸

Kingston Local Plan 2019 - 2041

- A.2.45 A new Local Plan is currently in the process of being developed and expected to be submitted for public examination in early 2025.
- A.2.46 Draft strategic policies relevant to the Project within the First draft of the Local Plan (Regulation 18) (Royal Borough of Kingston, 2024) include:

¹⁸ London Borough of Richmond upon Thames (2024) *Publication Local Plan*. Available at: https://www.Richmond.gov.uk/media/fomccpcf/publication_local_plan_low_resolution.pdf (Accessed: July 2024).

- A.2.47 KS1 – Social Infrastructure which covers a *‘range of services and facilities that contribute to a communities’ quality of life and their health and well-being.’*
- A.2.48 **KD2** - Design Considerations for Development. The council will support development proposals, which facilitate good physical and mental health and contribute to the wellbeing of the population and deliver healthy, liveable and accessible walkable neighbourhoods. Key drivers relevant to the design of the Project and the assessments of effects on human health are ensuring that:
- a. buildings and spaces are inclusive and accessible for all ages and disabilities, including the older population and disabled people.
 - b. a high standard of amenity for all that is well-designed, integrated and functional. It should mitigate issues of noise and air quality, support wellbeing and a variety of formal and informal activities.
 - c. active travel (walking and cycling) is encouraged by responding to desire lines, provide wide pavement areas, make provision for cycle parking and resting places around transport nodes and reduce vehicle dominance.
 - d. include, where possible, community spaces where people can freely meet and access support - including libraries, leisure centres, youth community centres, markets, festivals, sports competitions, arts events and street parties and
 - e. improve green and blue infrastructure to support the health and wellbeing of residents and wildlife (...).
- A.2.49 The policy goes on to encourage good design by demonstrating legible, overlooked and well-connected routes that promote active travel and the use of public transport.
- A.2.50 KS1 – Social Infrastructure – crucial to ensuring, ‘strong and inclusive communities, reducing inequalities in our society, contributing to a high quality of life and the health and well-being of local residents.’
- A.2.51 KS7 states that new developments should focus on increasing opportunities for play and informal recreation. Additionally, it emphasises the importance of improving access for children and young people to existing play, sports and youth facilities within the local area, particularly in areas with identified needs.
- A.2.52 KN2 - Open Spaces focuses on enhancing public access to open spaces by promoting walking and cycling connections to local parks and open spaces. It outlines that open spaces contribute to the quality of life and mental wellbeing of communities and, facilitate many physical activities and social interactions while also improving air quality.
- A.2.53 The policy notes that greater access to open spaces promotes a more active lifestyle and healthier living. It indicates that more appealing streets for walking and cycling can have positive psychological and physiological effects, potentially benefiting mental health by helping in stress management and reducing hospital admissions related to mental health issues.
- A.2.54 However, it also highlights that there are still a proportion of residents within the borough who lack close access to public open space. As such, the policy

mandates that developers work to improve public access and support walking and cycling connections to local parks and other open spaces.¹⁹

- A.2.55 Requirements for HIA for major developments are also reflected in each of the Local Plan policies listed above. This health assessment seeks to integrate principles of HIA into the EIA process, in line with the 'Health Impact Assessment in spatial planning guidance',²⁰ 2020, and **paragraph 9.18** of RBK's draft Local Plan.

Neighbourhood Plans

Ham and Petersham Neighbourhood Plan 2018 – 2033

- A.2.56 The Neighbourhood Plan contains the following policies which are relevant to the Project:
- a. Policy C1 – Protecting Green Character which encourages the distinction between built-up areas and green spaces, which will be retained. Enhancement or renewal of existing leisure facilities, must have regard for the semi-rural setting within the open spaces. Materials and design of structures adjacent to open spaces must be appropriate to the semi-rural setting.
 - b. Policy G1 – Open Spaces. These will be conserved and enhanced by their protection from development.²¹

Draft North Kingston Neighbourhood Plan 2019 - 2041 (Pre-Submission Plan)

- A.2.57 This Neighbourhood Plan covers the areas of Canbury and Tudor wards. The following draft policies are relevant to the Project:
- a. NK1 – NK8 Design Policy – notes the importance to preserve the area's unique character.
 - b. NK11 and NK10 – Community Facilities & Access and Movement Policies – underpins the London Plan for new housing development but to ensure the improvement of the local infrastructure and active travel.
 - c. NK13 – NK18 Climate Resilience, Green Infrastructure, Green Spaces and Public Realm Policies – protection of the biodiversity of the Neighbourhood's green infrastructure and the impact to well-being the green spaces have.²²

¹⁹ Royal Borough of Kingston upon Thames (2024) Kingston's First Draft Local Plan. Available at: https://www.kingstonletstalk.co.uk/planning/first-draft-local-plan/supporting_documents/Kingstons_first_draft_Local_Plan.pdf (Accessed: July 2024).

²⁰ Public Health England (2020) HIA in Planning Guide. Available at: https://assets.publishing.service.gov.uk/media/5f93024ad3bf7f35f184eb24/HIA_in_Planning_Guide_Sept2020.pdf (Accessed: July 2024).

²¹ London Borough of Richmond upon Thames. (2019). HPN Plan 2018 to 2033. [PDF] Available at: https://www.richmond.gov.uk/media/16749/hpn_plan_2018_to_2033_january_2019.pdf [Accessed Jan. 2025].

²² North Kingston Forum. (n.d.). North Kingston Neighbourhood Plan Consultation. Retrieved from <https://www.northkingstonforum.org/copy-of-nplan-consultation#:~:text=The%20Draft%20Plan%20seeks%20to,in%20the%20period%20to%202041> (accessed Jan 2025).

Twickenham Area Action Plan Adopted 2013

- A.2.58 This statutory land use plan provides a framework for revitalising the area. The following policies are of relevance to the Project:
- a. Policy TWP SD 1 – this policy focuses on taking a positive approach in favour of sustainable development.
 - b. 4. Transportation – a key aim is to improve walking routes. 4.3.1 focuses on maintaining cycle routes, widen existing cycle pathways and footpaths especially along the green corridor upstream along the River Crane. 4.4.1 – Pedestrian Environment, aims to create new and improve existing pedestrian routes, including a new routes along the River Crane.
 - c. 5. Environmental Improvements – this considers the enhancement and conservation of historic buildings, the surrounding environment and open spaces.
 - d. 6. Land Use Policies – 6.5 – Open Areas, this promotes the upgrading of existing open spaces and promotes new public space on the Twickenham Riverside and Crane Valley.²³

A.3 Joint Strategic Needs Assessments

- A.3.1 **Joint Strategic Needs Assessments (JSNA)** provide an understanding of the health and care needs of local communities in the study area focusing on population's health and behavioural risk factors. They help to identify commissioning priorities to improve health while reducing health inequalities. The following JSNA have been identified within the study area.

LBH JSNA: The Hounslow Joint Wellbeing Strategy 2023-2026

- A.3.2 The Hounslow JSNA takes the form of the data hub that feeds the Health and Wellbeing Strategy. Of relevance to the Project, the strategy promotes the following actions to improve health and wellbeing:
- a. Encourage participation in physical activity.
 - b. Improve connectivity and community connectors to reduced loneliness and improve community connectors.²⁴

LBR JSNA (no date)

- A.3.3 The LBR JSNA is maintained as an interactive web pages which includes data and strategies. The 2024 JSNA dashboard (RBK, 2024) is an Excel dashboard of key health indicator data. This will be referred to for more up to date data when developing the baseline for the Environment Statement.

²³ London Borough of Richmond upon Thames. (2013). Adopted Twickenham Area Action Plan, July 2013. [PDF] Available at: https://www.richmond.gov.uk/media/11660/adopted_twickenham_area_action_plan_july_2013.pdf [Accessed Jan. 2025].

²⁴ Hounslow Council. (2023). Hounslow Health and Wellbeing Strategy 2023 Update. [PDF] Available at: https://www.hounslow.gov.uk/downloads/file/4207/hounslow_health_and_wellbeing_strategy_2023-2026 [Accessed Jan. 2025].

A.3.4 LBR 18 Steps to Health and Wellbeing: Richmond Joint Local Health and Wellbeing Strategy, 2024-2029, include the priorities from the JSNA 2022. Of relevance to the Project:

- a. Step 12: Physical activity, whereby Richmond becomes one of the most active boroughs in London.
- b. Step 18: Social isolation, help connect people through Social Prescribing link workers.²⁵

Kingston JSNA 2023

A.3.5 Of relevance to the Project, the JSNA recommends the following to promote health in the borough:

- a. Continue to promote health and lifestyle advice to residents to encourage increased use of greenspace, active travel and in the continued development of the social prescribing offer in Kingston, ensure 'green' social prescribing offers are promoted and embedded in our offers for residents.
- b. Ensure all new developments have adequate and easily accessible green play space for both young children and teenagers.
- c. Promote physical activity related activities and volunteering opportunities to maximise wellbeing and community and support local green areas (and link these opportunities to physical activity promotion) - with a focus in areas of higher overweight and areas of premature mortality.
- d. Work in partnership with Parks and Green Spaces Teams and Kingston partners to try and get a daily offer physical activity offer in all Kingston green spaces - consider piloting in highest weight/ deprivation areas to start
- e. Ensure all new developments have adequate and easily accessible green outdoor space for adults of all ages and health status (...).²⁶

²⁵ London Borough of Richmond upon Thames. (2024). Joint Local Health and Wellbeing Strategy 2024-29. [PDF] Available at: https://richmond.gov.uk/media/2brg1wxv/joint_local_health_and_wellbeing_strategy_2024_29.pdf [Accessed Jan. 2025].

²⁶ Royal Borough of Kingston upon Thames (2023) Joint Strategic Needs Assessment 2023. Available at: <https://data.kingston.gov.uk/wp-content/uploads/2023/10/Online-Published-MASTER-FINAL-JSNA-2023.pdf> (Accessed: December 2024).

A.4 Health and Wellbeing Strategies

Richmond upon Thames Joint Local Health and Wellbeing Strategy (JLHWS) 2024-2029

- A.4.1 The Joint Local Strategy, 18 Steps to Health and Wellbeing, outlines plans for rethinking existing services and commissioning new ones, outlining collaboration among local organisations to implement proposed actions. It aims to create a fairer and healthier borough for all residents, promoting health and wellbeing and tackling inequalities and empower communities.²⁷

Kingston Refreshed Health and Care Plan 2022-2024

- A.4.2 This two-year care plan forms the first two years of Kingston's Joint Health and Wellbeing Strategy. It identifies four golden threads to improve health in the borough. The three most relevant to this Project include:
- a. Tackling inequalities: We will take action to tackle inequalities in health and reduce disparities for those most disadvantaged of all ages, tackling wider determinants of health and targeting resources where there is a proportionate need to improve life chances.
 - b. Obesity: We will take action to tackle obesity in all ages, enabling people to live a physically active and healthy lifestyle and at a healthy weight to prevent ill-health and improve wellbeing.
 - c. Promotion of good mental health and resilience: We will take action to promote the mental health and resilience of residents of all ages.²⁸

Hounslow Joint Health and Wellbeing Strategy 2023- 2026

- A.4.3 This strategy sets out a three-year vision for health and wellbeing in Hounslow with a particular focus on reducing health inequalities and improving health outcomes of vulnerable residents. The strategy adopts a 'population health management approach,' ensuring that wider determinants of health are targeted, particularly those who are disadvantaged by existing health inequalities.²⁹

²⁷ London Borough of Richmond upon Thames. (2024). *Joint Local Health and Wellbeing Strategy 2024-2029*. Available at: https://www.richmond.gov.uk/media/2brg1wxv/joint_local_health_and_wellbeing_strategy_2024_29.pdf (Accessed: December 2024).

²⁸ South West London Integrated Care System (2022) Kingston Health and Care Plan 2022 to 2024. Available at: <https://www.southwestlondonics.org.uk/wp-content/uploads/2022/06/Kingston-Health-and-Care-Plan-2022-to-2024.pdf> (Accessed: July 2024).

²⁹ London Borough of Hounslow (2023) Hounslow Health and Wellbeing Strategy 2023-2026. Available at: https://www.hounslow.gov.uk/downloads/file/4207/hounslow_health_and_wellbeing_strategy_2023-2026 (Accessed: December 2024).

A.5 Other Relevant Policies and Strategies

LBH Sport and Physical Activity Needs Assessment

- A.5.1 The council is creating a Sport and Physical Activity Needs Assessment and a Sport and Physical Activity Facility Review. These documents will inform council strategies and future planning decisions.³⁰

A.6 Water Industry Regulation

- A.6.1 Water industry related legislation has been considered to understand health protection measures which should be met through these regulatory measures.

Water Industry Act 1991: Section 208. The Security and Emergency Measures (Water and Sewerage Undertakers and Water Supply Licensees) Direction 2022 and The Security and Emergency Measures (Water and Sewerage Undertakers and Water Supply Licensees) (Amendment and Revocation) Direction 2024 (SEMD)

- A.6.2 The **SEMD** is the principal general direction issued by the Secretary of State and Welsh Ministers under Section 208 of the Water Industry Act 1991. It does not include human health as a specific focus area but focuses on establishing a framework to ensure water companies comply with the regulatory requirements to deliver and maintain safe, clean drinking water to consumers. Of relevance to human health, this policy ensures that health-related measures such as emergency response plans for interruption, loss of supply or contamination of drinking water are implemented, which safeguard the wellbeing of the population.³¹ The SEMD is referred to in the human health assessment in terms of standard good practice for securing safe drinking water.

The Water Supply (Water Quality) Regulations 2016

- A.6.3 This statutory instrument provides the legislative framework for drinking water quality in England in relation to public water supplies provided by water companies and licensed water suppliers. This is water intended for human consumption. The Drinking Water Inspectorate, acting on behalf of the Secretary of State, enforces the legislation.

³⁰ London Borough of Hounslow (2024) *Planning and Building*. Available at: <https://lbhounslow.sharepoint.com/sites/InternetLinks/pp/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FInternetLinks%2Fpp%2FShared%20documents%2FPlanning%20and%20Building%20%28WEBPAGES%29%2FPlanning> (Accessed: December 2024).

³¹ UK Government. (2022). *Water Security (Emergency Measures) Direction*. Available at: <https://assets.publishing.service.gov.uk/media/621deedcd3bf7f4f02760865/water-security-emergency-measures-direction-feb2022.pdf> (Accessed: 7 January 2025).

A.6.4 Part 3 of the legislation requires drinking water to be ‘wholesome,’ including with additional conditions to ensure water does not contain any micro-organisms or substances (other than a parameter listed in Schedule 1 of the Regulations) at a ‘*concentration or value which would constitute a potential danger to human health*’³².

³² The Water Supply (Water Quality) Regulations 2016 (2016 No. 614). Available at: https://www.legislation.gov.uk/uksi/2016/614/pdfs/uksiem_20160614_en.pdf (Accessed: December 2024).
Royal Borough of Kingston upon Thames (2024) JSNA dashboard. Available at: https://www.richmond.gov.uk/media/3oynyoai/jsna_at_a_glance_richmond.xlsx (Accessed May 2025).

